



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury

UNITED STATES OF AMERICA,

CR 2:25-cr-00228-PA

Plaintiff,

I N D I C T M E N T

v.

[21 U.S.C. § 846: Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine, Methamphetamine, Ketamine, and MDMA; 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii), (b)(1)(C), (b)(1)(E)(i): Distribution and Possession with Intent to Distribute Cocaine, Methamphetamine, Ketamine, and MDMA; 21 U.S.C. § 853: Criminal Forfeiture]

Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. The "Tor network," often referred to as "Tor," was a network of computers on the Internet, distributed around the world, that was designed to conceal the true Internet Protocol ("IP") addresses of the computers accessing the network, and, thereby, the locations and identities of the network's users. Web addresses on Tor could only be accessed through specific web browser software,

1 including a major dark-web browser known as "Tor Browser," designed  
2 to access the Tor network.

3       2. "Darknet markets," also called "dark web marketplaces,"  
4 refer to extensive, sophisticated, and widely used criminal  
5 marketplaces operating on the Tor network, which allow participants  
6 to buy and sell illegal items, such as drugs, and other hazardous  
7 materials with greater anonymity than is possible on the traditional  
8 Internet. Buyers purchase illegal narcotics and contraband from  
9 darknet markets using digital currency, such as Bitcoin and Monero.

10      3. Dream Market, Wallstreet, Empire, Silk Road 3.1, ToRReZ,  
11 Dark0de, World Market, Tor2Door, alphabay, Incognito, ASAP, Ares, MGM  
12 Grand, Archetyp, Abacus, DrugHub, and DarkMatter were, at various  
13 times, popular darknet markets widely used by individuals in the  
14 United States to buy and sell drugs and other contraband.

15      4. Vendors and buyers on Dream Market, Wallstreet, Empire,  
16 Silk Road 3.1, ToRReZ, Dark0de, World Market, Tor2Door, alphabay,  
17 Incognito, ASAP, Ares, MGM Grand, Archetyp, Abacus, DrugHub, and  
18 DarkMatter markets operated under anonymous monikers. However,  
19 similar to traditional e-commerce websites that offer legitimate  
20 goods for sale, vendors on the darknet markets received ratings from  
21 buyers based on, among other things, the purported quality of the  
22 drugs sold, reliability of delivery, and whether the vendor was  
23 responsive to questions about the contraband being sold.

24      5. Vendors on darknet markets concealed their communications  
25 with buyers through an encryption system known as "Pretty Good  
26 Privacy" or simply "PGP encryption". Secure communication using PGP  
27 encryption required the use of what is known as a "public key," which  
28 is a string of alphanumeric characters that enabled a user to receive

1 encrypted messages from others. Since public keys were associated  
 2 with specific anonymous monikers, vendors on darknet marketplaces  
 3 listed their public keys in listings for illegal drugs and contraband  
 4 so that buyers could communicate directly with the vendor.

5 6. Vendors JoyInc, LaFarmacia, WhiteDoc, JanesAddiction,  
 6 DaShop, WhiteRepublic, Tomorowland, PlanetHollywood, DopeValley, and  
 7 Major2Minor sold cocaine, methamphetamine, 3, 4-  
 8 Methylenedioxymethamphetamine ("MDMA"), and ketamine to drug  
 9 customers on these darknet markets in exchange for cryptocurrency,  
 10 such as Bitcoin and Monero, and shipped the drugs throughout the  
 11 United States via the United States Postal Service. An example of  
 12 vendor JoyInc on the Drughub market selling ketamine, MDMA, and bulk  
 13 options of cocaine on September 4, 2024, is depicted below.

The screenshot shows the Drughub market interface. At the top, there are navigation links for 'Log In', 'Register', 'Vendor Area', and 'Info'. The top right shows a 'Cart' with 0 XMR and a 'guest' status. The main header says '29 Listings'. Below the header, there are three product cards for vendor 'joyinc'.

- EXCLUSIVE 94-95% PURITY COCAINE - CINDERELLA BATCH**  
 Drugs > Stimulants - Cocaine  
 Vendor: joyinc 100%  
 From 0.604734204919 XMR  
 From USD 105.00  
 Stock: Available  
 Bulk Options View Product
- 3.5G PURE PURPLE/CHAMPAIGNE MDMA straight from EUROPE 88-90%**  
 Drugs > Ecstasy - MDMA  
 Vendor: joyinc 100%  
 From 0.633531071820 XMR  
 From USD 110.00  
 Stock: Available  
 View Product
- 14G Ketamine (ketamin) S-isomer/R-isomer**  
 Drugs > Dissociatives - Ketamine  
 Vendor: joyinc 100%  
 From 2.505327420377 XMR  
 From USD 435.00  
 Stock: Available  
 View Product

27 7. These Introductory Allegations are incorporated into each  
 28 count of the Indictment.

1 COUNT ONE

2 [21 U.S.C. § 846]

3 [ALL DEFENDANTS]

4 A. OBJECTS OF THE CONSPIRACY

5 Beginning on a date unknown to the Grand Jury, but no later than  
6 in or around September 2018, and continuing through a date unknown,  
7 but no earlier than on or about February 4, 2025, in Los Angeles  
8 County, within the Central District of California, and elsewhere,  
9 defendants DAVIT AVALYAN ("AVALYAN"), HRANT GEVORGYAN ("GEVORGYAN"),  
10 HAYK GRIGORYAN ("GRIGORYAN"), also known as ("aka") "Hayk Greg," and  
11 GURGEN NERSESYAN ("NERSESYAN"), aka "Guro Tiko," conspired with each  
12 other and with others known and unknown to the Grand Jury, to  
13 knowingly and intentionally distribute and possess with intent to  
14 distribute the following controlled substances:

15 1. At least 50 grams of methamphetamine, a Schedule II  
16 controlled substance, in violation of Title 21, United States Code,  
17 Sections 841(a)(1), (b)(1)(A)(viii);

18 2. At least 5 grams of methamphetamine, a Schedule II  
19 controlled substance, in violation of Title 21, United States Code,  
20 Sections 841(a)(1), (b)(1)(B)(viii);

21 3. At least 500 grams of a mixture and substance containing a  
22 detectable amount of cocaine, a Schedule II narcotic drug controlled  
23 substance, in violation of Title 21, United States Code, Sections  
24 841(a)(1), (b)(1)(B)(ii)(II);

25 4. Cocaine, a Schedule II narcotic drug controlled substance,  
26 in violation of Title 21, United States Code, Sections 841(a)(1),  
27 (b)(1)(C);

1       5. Methamphetamine, a Schedule II controlled substance, in  
2 violation of Title 21, United States Code, Sections 841(a)(1),  
3 (b)(1)(C);

4       6. 3, 4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I  
5 controlled substance, in violation of Title 21, United States Code,  
6 Sections 841(a)(1), (b)(1)(C); and

7       7. Ketamine, a Schedule III controlled substance, in violation  
8 of Title 21, United States Code, Sections 841(a)(1), (b)(1)(E)(i).

9       B. MANNER AND MEANS OF THE CONSPIRACY

10       The objects of the conspiracy were to be accomplished, in  
11 substance, as follows:

12       1. Co-conspirators would maintain dark net drug vendor  
13 accounts, including "JoyInc," "LaFarmacia," "Whitedoc,"  
14 "JanesAddiction," "DaShop," "WhiteRepublic," "Tomorowlan,"  
15 "PlanetHollywood," "DopeValley," and "Major2Minor," which operated on  
16 several darknet marketplaces, including Dream Market, Wallstreet,  
17 Empire, Silk Road 3.1, TORReZ, Dark0de, World Market, Tor2Door,  
18 alphabay, Incognito, ASAP, Ares, MGM Grand, Archetyp, Abacus,  
19 DrugHub, and DarkMatter and would sell methamphetamine, cocaine,  
20 MDMA, and ketamine to customers across the United States.

21       2. Defendants AVALYAN, GEVORGYAN, GRIGORYAN, and NERSESYAN  
22 would fulfill drug orders through the various darknet drug vendor  
23 accounts by packaging the drugs into parcels and by delivering those  
24 drug parcels to post offices and postal mailboxes in Los Angeles  
25 County and elsewhere.

26       3. Defendant AVALYAN would obtain tracking labels and purchase  
27 bulk quantities of postage stamps from United States Post Offices to  
28 ship drug orders.

1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish its objects,  
3 on or about the following dates, defendants AVALYAN, GEVORGYAN,  
4 GRIGORYAN, and NERSESYAN, and others known and unknown to the Grand  
5 Jury, committed various overt acts within the Central District of  
6 California, and elsewhere, including, but not limited to, the  
7 following:

8 **November 15, 2018 Cocaine Sale Via JoyInc**

9 Overt Act No. 1: On November 15, 2018, at least one co-  
10 conspirator operating the "JoyInc" vendor account on the Dream Market  
11 marketplace accepted an order for two grams of cocaine, paid via  
12 Bitcoin, from a person who the co-conspirator believed was a drug  
13 buyer, but who, in fact, was an undercover Special Agent of the  
14 Federal Bureau of Investigation ("FBI").

15 Overt Act No. 2: On November 16, 2018, after receiving the  
16 Bitcoin payment from an FBI Special Agent, at least one co-  
17 conspirator packaged and shipped a parcel containing approximately  
18 1.999 grams of a mixture and substance containing a detectable amount  
19 of cocaine to an FBI Special Agent.

20 **November 15, 2018 Cocaine Sale Via La Farmacia**

21 Overt Act No. 3: On November 15, 2018, at least one co-  
22 conspirator operating the "La\_Farmacia" vendor account on the Dream  
23 Market marketplace accepted an order for 3.5 grams of cocaine, paid  
24 via Bitcoin, from a person who the co-conspirator believed was a drug  
25 buyer, but who, in fact, was an undercover FBI Special Agent. The  
26 vendor webpage stated, "WE REPRESENT A SMALL PART OF A BIG  
27 TRAFFICKING RING, RECENTLY FOUND OUT ABOUT DARK WEB, DECIDED TO  
28 EXPAND OUR OPERATIONS."

1        Overt Act No. 4:    On November 17, 2018, after receiving the  
2 Bitcoin payment from an FBI Special Agent, at least one co-  
3 conspirator packaged and shipped a parcel containing approximately  
4 3.539 grams of a mixture and substance containing a detectable amount  
5 of cocaine to an FBI Special Agent.

6        **February 7, 2019 Cocaine Sale Via JoyInc**

7        Overt Act No. 5:    On February 7, 2019, at least one co-  
8 conspirator operating the "JoyInc" vendor account on the Dream Market  
9 marketplace accepted an order for two grams of cocaine, paid via  
10 Bitcoin, from a person who the co-conspirator believed was a drug  
11 buyer, but who, in fact, was an undercover FBI Special Agent.

12        Overt Act No. 6:    After receiving the Bitcoin payment from an  
13 FBI Special Agent, at least one co-conspirator packaged and shipped a  
14 parcel containing approximately 1.981 grams of a mixture and  
15 substance containing a detectable amount of cocaine to an FBI Special  
16 Agent, who received it on February 11, 2019.

17        **March 19, 2019 Cocaine Sale Via JoyInc**

18        Overt Act No. 7:    On March 19, 2019, at least one co-  
19 conspirator operating the "JoyInc" vendor account on the Dream Market  
20 marketplace accepted an order for two grams of cocaine, paid via  
21 Bitcoin, from a person who the co-conspirator believed was a drug  
22 buyer, but who, in fact, was an undercover FBI Special Agent.

23        Overt Act No. 8:    After receiving the Bitcoin payment from an  
24 FBI Special Agent, at least one co-conspirator packaged and shipped a  
25 parcel containing approximately 2.000 grams of a mixture and  
26 substance containing a detectable amount of cocaine to an FBI Special  
27 Agent, who received it on March 21, 2019.

## April 3, 2019 Cocaine Sale Via JoyInc

Overt Act No. 9: On April 3, 2019, at least one co-conspirator operating the "JoyInc" vendor account on the Wallstreet marketplace accepted an order for four grams of cocaine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Special Agent.

Overt Act No. 10: After receiving the Bitcoin payment from an FBI Special Agent, at least one co-conspirator packaged and shipped a parcel containing approximately 3.9 grams of a mixture and substance containing a detectable amount of cocaine to an FBI Special Agent, who received it on April 18, 2019.

April 25, 2019 Cocaine Sale Via JoyInc

Overt Act No. 11: On April 25, 2019, at least one co-conspirator operating the "JoyInc" vendor account on the Empire marketplace accepted an order for two grams of cocaine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover Homeland Security Investigations ("HSI") Special Agent.

Overt Act No. 12: After receiving the Bitcoin payment from an HSI Special Agent, at least one co-conspirator packaged and shipped a parcel containing approximately 1.984 grams of a mixture and substance containing a detectable amount of cocaine to an FBI Special Agent, who received it on April 29, 2019.

June 11, 2019 Cocaine Sale Via JoyInc

Overt Act No. 13: On June 11, 2019, at least one co-conspirator operating the "JoyInc" vendor account on the Empire marketplace accepted an order for 7.5 grams of cocaine, paid via Bitcoin, from a person who the co-conspirator believed was a drug

1 buyer, but who, in fact, was an undercover FBI Special Agent. The  
 2 vendor webpage stated, "We are not new . . . We are new here on  
 3 EMPIRE. Please welcome vendor JOYinc very reputable vendor with 3K+  
 4 sales and A+ rating from other markets."

5 Overt Act No. 14: After receiving the Bitcoin payment from an  
 6 FBI Special Agent, at least one co-conspirator packaged and shipped a  
 7 parcel containing approximately 7.4 grams of a mixture and substance  
 8 containing a detectable amount of cocaine to an FBI Special Agent,  
 9 who received it on June 17, 2019.

10 **September 26, 2019 MDMA Sale Via Whitedoc**

11 Overt Act No. 15: On September 26, 2019, at least one co-  
 12 conspirator operating the "Whitedoc" vendor account on the Silk Road  
 13 3.1 marketplace accepted an order for 3.5 grams of MDMA, paid via  
 14 Bitcoin, from a person who the co-conspirator believed was a drug  
 15 buyer, but who, in fact, was an undercover FBI Special Agent.

16 Overt Act No. 16: After receiving the Bitcoin payment from an  
 17 FBI Special Agent, at least one co-conspirator packaged and shipped a  
 18 parcel containing approximately 3.47 grams of MDMA to an FBI Special  
 19 Agent, who received it on September 30, 2019.

20 **April 29, 2020 Cocaine Sale Via JoyInc**

21 Overt Act No. 17: On April 29, 2020, at least one co-  
 22 conspirator operating the "JoyInc" vendor account on the Empire  
 23 marketplace accepted an order for 3.5 grams of cocaine, paid via  
 24 Bitcoin, from a person who the co-conspirator believed was a drug  
 25 buyer, but who, in fact, was an undercover FBI Special Agent.

26 Overt Act No. 18: After receiving the Bitcoin payment from an  
 27 FBI Special Agent, at least one co-conspirator packaged and shipped a  
 28 parcel containing approximately 3.50 grams of a mixture and substance

1 containing a detectable amount of cocaine to an FBI Special Agent,  
2 who received it on May 11, 2020.

3 **May 25, 2021 Methamphetamine Sale Via LaFarmacia**

4 Overt Act No. 19: On May 25, 2021, at least one co-conspirator  
5 operating the "LaFarmacia" vendor account on the ToRReZ marketplace  
6 accepted an order for 28 grams of methamphetamine, paid via Monero,  
7 from a person who the co-conspirator believed was a drug buyer, but  
8 who, in fact, was an undercover FBI Special Agent.

9 Overt Act No. 20: After receiving the Monero payment from an  
10 FBI Special Agent, at least one co-conspirator packaged and shipped  
11 four parcels containing a total of approximately 26.39 grams of  
12 methamphetamine to an FBI Special Agent, who received them on June 1,  
13 2021. One of the parcels bore the sender name R.K. at an address in  
14 Los Angeles, California, and another parcel bore the sender name M.I.  
15 at an address in Los Angeles, California.

16 **June 15, 2021 Methamphetamine Sale Via JoyInc**

17 Overt Act No. 21: On June 15, 2021, at least one co-  
18 conspirator operating the "JoyInc" vendor account on the Dark0de  
19 marketplace accepted an order for seven grams of methamphetamine,  
20 paid via Bitcoin, from a person who the co-conspirator believed was a  
21 drug buyer, but who, in fact, was an undercover FBI Special Agent.

22 Overt Act No. 22: After receiving the Bitcoin payment from an  
23 FBI Special Agent, at least one co-conspirator packaged and shipped a  
24 parcel containing approximately 6.632 grams of methamphetamine to an  
25 FBI Special Agent, who received it on June 23, 2021.

26 **July 9, 2021 Methamphetamine Sale Via JanesAddiction**

27 Overt Act No. 23: On July 9, 2021, at least one co-conspirator  
28 operating the "JanesAddiction" vendor account on the ToRReZ

1 marketplace accepted an order for 3.5 grams of methamphetamine, paid  
2 via Bitcoin, from a person who the co-conspirator believed was a drug  
3 buyer, but who, in fact, was an undercover FBI Analyst.

4 Overt Act No. 24: After receiving the Bitcoin payment from an  
5 FBI Analyst, at least one co-conspirator packaged and shipped a  
6 parcel containing approximately 3.397 grams of methamphetamine to an  
7 FBI Special Agent, who received it on July 16, 2021. The parcel bore  
8 sender name F.W. at an address in Los Angeles, California.

9 **Co-conspirator Communications**

10 Overt Act No. 25: On October 5, 2021, defendant GRIGORYAN said  
11 to defendant NERSESYAN in a chat, “[W]ere you aware that they had  
12 increased the prices for the stamps? . . . All the ones that were  
13 sent on Monday gradually will be coming back.”

14 **October 5, 2021 Methamphetamine Sale Via JanesAddiction**

15 Overt Act No. 26: On October 5, 2021, at least one co-  
16 conspirator operating the “JanesAddiction” vendor account on the  
17 TORReZ marketplace accepted an order for 14 grams of methamphetamine,  
18 paid via Bitcoin, from a person who the co-conspirator believed was a  
19 drug buyer, but who, in fact, was an undercover FBI Analyst.

20 Overt Act No. 27: After receiving the Bitcoin payment from an  
21 FBI Analyst, at least one co-conspirator packed and shipped two  
22 parcels containing a total of approximately 14.0 grams of  
23 methamphetamine to an FBI Special Agent, who received them on October  
24 15, 2021. One parcel bore sender name S.H. at an address in Los  
25 Angeles, California, with a Castillo de San Marcos stamp and an  
26 additional stamp.

October 20, 2021 Methamphetamine Sale Via JOYInc

Overt Act No. 28: On October 20, 2021, at least one co-conspirator operating the "JOYInc" vendor account on the ToRReZ marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Special Agent.

Overt Act No. 29: After receiving the Bitcoin payment from an FBI Special Agent, at least one co-conspirator packed and shipped a parcel containing approximately 6.99 grams of methamphetamine to an FBI Special Agent, who received it on October 28, 2021.

October 21, 2021 Methamphetamine Sale Via LaFarmacia

Overt Act No. 30: On October 21, 2021, at least one co-conspirator operating the "LaFarmacia" vendor account on the ToRReZ marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst.

Overt Act No. 31: After receiving the Bitcoin payment from an FBI Analyst, at least one co-conspirator packed and shipped a parcel containing approximately 6.90 grams of methamphetamine to an FBI Special Agent, who received it on October 28, 2021.

January 18, 2022 Cocaine and MDMA Sale Via DaShop

Overt Act No. 32: On January 18, 2022, at least one co-conspirator operating the "DaShop" vendor account on the Dark0de marketplace accepted an order for 3.5 grams of cocaine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover Drug Enforcement Administration ("DEA") Special Agent.

Overt Act No. 33: On January 18, 2022, at least one co-conspirator operating the “DaShop” vendor account on the Dark0de marketplace accepted an order for seven grams of MDMA, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover DEA Special Agent.

Overt Act No. 34: After receiving the Bitcoin payment from a DEA Special Agent, at least one co-conspirator packed and shipped a parcel containing approximately 3.50 grams of a mixture and substance containing a detectable amount of cocaine and approximately 6.947 grams of MDMA to a DEA Special Agent, who received it on January 26, 2022.

## February 3, 2022 Methamphetamine Sale Via WhiteRepublic

Overt Act No. 35: On February 3, 2022, at least one co-conspirator operating the "WhiteRepublic" vendor account on the DarkOde marketplace accepted an order for 3.5 grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Special Agent.

Overt Act No. 36: After receiving the Bitcoin payment from an FBI Special Agent, at least one co-conspirator packed and shipped a parcel containing approximately 3.50 grams of methamphetamine to an FBI Special Agent, who received it on February 16, 2022.

February 3, 2022 Methamphetamine Sale Via WhiteDoc

Overt Act No. 37: On February 3, 2022, at least one co-conspirator operating the "WhiteDoc" vendor account on the World Market marketplace accepted an order for 3.5 grams of methamphetamine, paid via Bitcoin, from a person who the co-

1 conspirator believed was a drug buyer, but who, in fact, was an  
2 undercover FBI Analyst.

3 Overt Act No. 38: After receiving the Bitcoin payment from an  
4 FBI Analyst, at least one co-conspirator packed and shipped a parcel  
5 containing approximately 3.44 grams of methamphetamine to an FBI  
6 Special Agent, who received it on February 9, 2022.

7 **February 9, 2022 Methamphetamine Sale Via Tomorrowland**

8 Overt Act No. 39: On February 9, 2022, at least one co-  
9 conspirator operating the "Tomorrowland" vendor account on the Dark0de  
10 marketplace accepted an order for seven grams of methamphetamine,  
11 paid via Bitcoin, from a person who the co-conspirator believed was a  
12 drug buyer, but who, in fact, was an undercover FBI Special Agent.

13 Overt Act No. 40: After receiving the Bitcoin payment from an  
14 FBI Special Agent, at least one co-conspirator packed and shipped a  
15 parcel containing approximately 6.832 grams of methamphetamine to an  
16 FBI Special Agent, who received it on February 22, 2022. The parcel  
17 bore a Castillo de San Marcos stamp with an additional stamp, and the  
18 sender name F.W. at an address in Los Angeles, California, which  
19 matched the sender information for the parcel described in Overt Act  
20 24.

21 **Co-conspirator Communications**

22 Overt Act No. 41: On February 22, 2022, defendant NERSESYAN  
23 said to defendant GRIGORYAN in a chat, "Tomorrow I will bring  
24 stamps."

25 **March 14, 2022 Cocaine and MDMA Sale Via DaShop**

26 Overt Act No. 42: On March 14, 2022, at least one co-  
27 conspirator operating the "DaShop" vendor account on the World Market  
28 marketplace accepted an order for 3.5 grams of cocaine, paid via

1 Bitcoin, from a person who the co-conspirator believed was a drug  
2 buyer, but who, in fact, was an undercover Costa Mesa Police  
3 Department ("CMPD") Detective.

4 Overt Act No. 43: On March 14, 2022, at least one co-  
5 conspirator operating the "DaShop" vendor account on the World Market  
6 marketplace accepted an order for one gram of MDMA, paid via Bitcoin,  
7 from a person who the co-conspirator believed was a drug buyer, but  
8 who, in fact, was an undercover CMPD Detective.

9 Overt Act No. 44: After receiving the Bitcoin payment from a  
10 CMPD Detective, at least one co-conspirator packed and shipped a  
11 parcel containing approximately 3.50 grams of a mixture and substance  
12 containing a detectable amount of cocaine and approximately 1.018  
13 grams of MDMA to a CMPD Detective, who received it on March 25, 2022.

14 **July 13, 2022 Methamphetamine Sale Via JoyInc**

15 Overt Act No. 45: On July 13, 2022, at least one co-  
16 conspirator operating the "JoyInc" vendor account on the Tor2Door  
17 marketplace accepted an order for seven grams of methamphetamine,  
18 paid via Bitcoin, from a person who the co-conspirator believed was a  
19 drug buyer, but who, in fact, was an undercover FBI Analyst.

20 Overt Act No. 46: After receiving the Bitcoin payment from an  
21 FBI Analyst, at least one co-conspirator packed and shipped a parcel  
22 containing approximately 6.912 grams of methamphetamine to an FBI  
23 Special Agent, who received it on July 18, 2022.

24 **Co-conspirator Communications**

25 Overt Act No. 47: On August 19, 2022, defendant GRIGORYAN said  
26 to defendant NERSESYAN in a chat, "Ready our old house parking.  
27 Inside the Civic, the key is under the windshield. Take the key and  
28 keep it with you."

Overt Act No. 48: On August 23, 2022, defendant GRIGORYAN said to defendant NERSESYAN in a chat, "Ready, the Civic's trunk. All the bags."

Overt Act No. 49: Between August 27, 2022 and April 5, 2023, defendant GRIGORYAN said to defendant NERSESYAN in chats, "Ready Civic" approximately 84 times.

November 16, 2022 Methamphetamine Sale Via JoyInc

Overt Act No. 50: On November 16, 2022, at least one co-conspirator operating the "JoyInc" vendor account on the alphabay marketplace accepted an order for 21 grams of methamphetamine, paid via Monero, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover CMPD Detective.

Overt Act No. 51: After receiving the Monero payment from a CMPD Detective, at least one co-conspirator packed and shipped two parcels containing a total of approximately 21.03 grams of methamphetamine, obtained by a DEA Special Agent on November 30, 2022.

December 2, 2022 Methamphetamine Sale Via JoyInc

Overt Act No. 52: On December 2, 2022, at least one co-conspirator operating the "JoyInc" vendor account on the Incognito marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst. The vendor webpage stated, "Please welcome one of the oldest vendors at dark world - JOYinc. Made 10K+ sales and got A+ Rating for Quality, Stealth and Delivery time[.] Each week I have new batches of COCAINE, KETAMINE, EUROPE MOONROCK MDMA, METH CRYSTALS."

Overt Act No. 53: After receiving the Bitcoin payment from an FBI Analyst, at least one co-conspirator packed and shipped a parcel containing approximately 6.859 grams of methamphetamine to an FBI Special Agent, who received it on December 12, 2022.

### Co-conspirator Communications

Overt Act No. 54: On January 18, 2023, defendant NERSESYAN said to defendant GRIGORYAN in a chat, "I have ordered more stamps again."

January 23, 2023 Methamphetamine Sale Via PlanetHollywood

Overt Act No. 55: On January 23, 2023, at least one co-conspirator operating the "PlanetHollywood" vendor account on the ASAP marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst.

Overt Act No. 56: After receiving the Bitcoin payment from an FBI Analyst, at least one co-conspirator packed and shipped a parcel containing approximately 7.09 grams of methamphetamine to an FBI Special Agent, who received it on January 27, 2023. The parcel bore sender name J.C. at an address in Anaheim, California.

## February 10, 2023 Methamphetamine Sale Via DopeValley

Overt Act No. 57: On February 10, 2023, at least one co-conspirator operating the "DopeValley" vendor account on the Incognito marketplace accepted an order for eight grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst.

Overt Act No. 58: After receiving the Bitcoin payment from an FBI Analyst, at least one co-conspirator packed and shipped a parcel containing approximately 7.771 grams of methamphetamine to an FBI Special Agent, who received it on February 17, 2023. The parcel bore sender name E.B. at an address in Encino, California.

### Co-conspirator Communications

Overt Act No. 59: On February 17, 2023, defendant NERSESYAN said to defendant GRIGORYAN in a chat, "There are still 1600 stamps, from the older ones."

February 17, 2023 Cocaine Sale Via DaShop

Overt Act No. 60: On February 17, 2023, at least one co-conspirator operating the "DaShop" vendor account on the Incognito marketplace accepted an order for five grams of cocaine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Special Agent.

Overt Act No. 61: After receiving the Bitcoin payment from an FBI Special Agent, at least one co-conspirator packed and shipped a parcel containing approximately 5.042 grams of a mixture and substance containing a detectable amount of cocaine to an FBI Special Agent, who received it on March 1, 2023. The parcel bore sender name J.R. at an address in Los Angeles, California.

February 18, 2023 Methamphetamine Sale Via PlanetHollywood

Overt Act No. 62: On February 18, 2023, at least one co-conspirator operating the "PlanetHollywood" vendor account on the Incognito marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst.

1       Overt Act No. 63: After receiving the Bitcoin payment from an  
2 FBI Analyst, at least one co-conspirator packed and shipped a parcel  
3 containing approximately 6.831 grams of methamphetamine to an FBI  
4 Special Agent, who received it on March 2, 2023.

5       **February 20, 2023 Methamphetamine Sale Via WhiteDoc**

6       Overt Act No. 64: On February 20, 2023, at least one co-  
7 conspirator operating the "WhiteDoc" vendor account on the Incognito  
8 marketplace accepted an order for 3.5 grams of methamphetamine, paid  
9 via Bitcoin, from a person who the co-conspirator believed was a drug  
10 buyer, but who, in fact, was an undercover CMPD Detective.

11       Overt Act No. 65: After receiving the Bitcoin payment from a  
12 CMPD Detective, at least one co-conspirator packed and shipped a  
13 parcel containing approximately 3.47 grams of methamphetamine,  
14 obtained by a DEA Special Agent on February 24, 2023.

15       **February 20, 2023 MDMA Sale Via Major2Minor**

16       Overt Act No. 66: On February 20, 2023, at least one co-  
17 conspirator operating the "Major2Minor" vendor account on the ASAP  
18 marketplace accepted an order for .3 grams of MDMA, paid via Bitcoin,  
19 from a person who the co-conspirator believed was a drug buyer, but  
20 who, in fact, was an undercover CMPD Detective.

21       Overt Act No. 67: After receiving the Bitcoin payment from a  
22 CMPD Detective, at least one co-conspirator packed and shipped a  
23 parcel containing approximately 0.319 grams of MDMA, obtained by a  
24 DEA Special Agent on February 24, 2023. The parcel bore sender name  
25 R.T. at an address in Oxnard, California.

26       **February 20, 2023 Methamphetamine Sale Via JoyInc**

27       Overt Act No. 68: On February 20, 2023, at least one co-  
28 conspirator operating the "JoyInc" vendor account on the ASAP

1 marketplace accepted an order for 7 grams of methamphetamine, paid  
2 via Bitcoin, from a person who the co-conspirator believed was a drug  
3 buyer, but who, in fact, was an undercover CMPD Detective.

4 Overt Act No. 69: After receiving the Bitcoin payment from a  
5 CMPD Detective, at least one co-conspirator packed and shipped a  
6 parcel containing approximately 6.99 grams of methamphetamine,  
7 obtained by a DEA Special Agent on February 24, 2023.

8 **February 20, 2023 Methamphetamine Sale Via TomorrowLand**

9 Overt Act No. 70: On February 20, 2023, at least one co-  
10 conspirator operating the "TomorrowLand" vendor account on the ASAP  
11 marketplace accepted an order for 2 grams of methamphetamine, paid  
12 via Bitcoin, from a person who the co-conspirator believed was a drug  
13 buyer, but who, in fact, was an undercover CMPD Detective.

14 Overt Act No. 71: After receiving the Bitcoin payment from a  
15 CMPD Detective, at least one co-conspirator packed and shipped a  
16 parcel containing approximately 2.02 grams of methamphetamine,  
17 obtained by a DEA Special Agent on February 24, 2023. The parcel  
18 bore sender name S.B.C. at an address in Glendora, California.

19 **February 20, 2023 Methamphetamine Sale Via JanesAddiction**

20 Overt Act No. 72: On February 20, 2023, at least one co-  
21 conspirator operating the "JanesAddiction" vendor account on the ASAP  
22 marketplace accepted an order for two grams of methamphetamine, paid  
23 via Bitcoin, from a person who the co-conspirator believed was a drug  
24 buyer, but who, in fact, was an undercover CMPD Detective.

25 Overt Act No. 73: After receiving the Bitcoin payment from a  
26 CMPD Detective, at least one co-conspirator packed and shipped a  
27 parcel containing approximately 2.00 grams of methamphetamine,

1 obtained by a DEA Special Agent on February 24, 2023. The parcel  
2 bore sender name C.C. at an address in Los Angeles, California.

3 **February 20, 2023 Methamphetamine Sale Via LaFarmacia**

4 Overt Act No. 74: On February 20, 2023, at least one co-  
5 conspirator operating the "LaFarmacia" vendor account on the  
6 Incognito marketplace accepted an order for seven grams of  
7 methamphetamine, paid via Bitcoin, from a person who the co-  
8 conspirator believed was a drug buyer, but who, in fact, was an  
9 undercover CMPD Detective.

10 Overt Act No. 75: After receiving the Bitcoin payment from a  
11 CMPD Detective, at least one co-conspirator packed and shipped a  
12 parcel containing approximately 6.91 grams of methamphetamine,  
13 obtained by a DEA Special Agent on February 24, 2023. The parcel  
14 bore sender name J.M. at an address in Inglewood, California.

15 **February 22, 2023 Methamphetamine Sale Via DopeValley**

16 Overt Act No. 76: On February 22, 2023, at least one co-  
17 conspirator operating the "DopeValley" vendor account on the  
18 Incognito marketplace accepted an order for four grams of  
19 methamphetamine, paid via Bitcoin, from a person who the co-  
20 conspirator believed was a drug buyer, but who, in fact, was an  
21 undercover FBI Special Agent.

22 Overt Act No. 77: After receiving the Bitcoin payment from an  
23 FBI Special Agent, at least one co-conspirator packed and shipped a  
24 parcel containing approximately 3.995 grams of methamphetamine to an  
25 FBI Special Agent, who received it on March 3, 2023. The parcel bore  
26 sender name M.H. at an address in Corona, California.

March 8, 2023 Ketamine Sale Via JoyInc

Overt Act No. 78: On March 8, 2023, at least one co-conspirator operating the "JoyInc" vendor account on the Ares marketplace accepted an order for one gram of ketamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover CMPD Detective.

Overt Act No. 79: After receiving the Bitcoin payment from a CMPD Detective, at least one co-conspirator packed and shipped a parcel containing approximately 1.014 grams of ketamine, obtained by a DEA Special Agent on March 17, 2023. The parcel had a Florida Everglades stamp and bore sender name T.P. at an address in Oxnard, California.

**AVALYAN Stamp Purchases and Repeat Sender Information**

Overt Act No. 80: On March 16, 2023, defendant AVALYAN purchased stamps and obtained a roll of tracking number stickers at a post office in Glendale, California.

Overt Act No. 81: On March 28, 2023, a co-conspirator shipped a United States Postal Service ("USPS") Priority Mail envelope bearing tracking number 0154 and containing approximately 6.800 grams of methamphetamine. The parcel bore a Florida Everglades stamp and the sender name T.P. at an address in Oxnard, California, which matched the sender information for the parcel described in Overt Act 79.

Overt Act No. 82: On April 18, 2023, defendant AVALYAN purchased approximately 140 Priority stamps for \$1,351 cash at a post office in Glendale, California.

Overt Act No. 83: On April 18, 2023, defendant AVALYAN went to seven additional post offices in Pasadena, Burbank, and North

1 Hollywood, over approximately two and a half hours, attempting to  
2 purchase or purchasing additional stamps before returning to a  
3 commercial building on Victory Boulevard in North Hollywood.

4 **June 12, 2023 Shipments with AVALYAN Tracking Numbers**

5 Overt Act No. 84: On June 12, 2023, a co-conspirator shipped a  
6 USPS Priority Mail envelope bearing an FBI recorded tracking number  
7 ending in 5135 sold to AVALYAN on March 16, 2023, and containing  
8 approximately 4.01 grams of a mixture and substance containing a  
9 detectable amount of cocaine. The parcel bore the sender name T.P.  
10 at an address in Oxnard, California, which matched the sender  
11 information for the parcels described in Overt Acts 79 and 81.

12 Overt Act No. 85: On June 12, 2023, a co-conspirator shipped a  
13 USPS Priority Mail envelope bearing an FBI recorded tracking number  
14 ending in 4879 sold to AVALYAN on March 16, 2023, with a Florida  
15 Everglades stamp, and containing approximately 0.27 grams of MDMA.

16 Overt Act No. 86: On June 12, 2023, a co-conspirator shipped a  
17 USPS Priority Mail envelope bearing an FBI recorded tracking number  
18 ending in 6255 sold to AVALYAN on March 16, 2023, and containing  
19 approximately 3.356 grams of methamphetamine. The parcel bore a  
20 Florida Everglades stamp, and the sender name J.R. at an address in  
21 Los Angeles, California, which matched the sender information for the  
22 parcel described in Overt Act 61.

23 Overt Act No. 87: On June 12, 2023, a co-conspirator shipped a  
24 USPS Priority Mail envelope bearing an FBI recorded tracking number  
25 ending in 6545 sold to AVALYAN on March 16, 2023, with a Florida  
26 Everglades stamp, and containing approximately 1.022 grams of a  
27 mixture and substance containing a detectable amount of cocaine.

June 29, 2023 NERSESYAN Shipments

Overt Act No. 88: On June 29, 2023, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing tracking number ending in 0606 from a post office in Los Angeles, California. The parcel bore a Monument Valley stamp, and the sender name M.H. at an address in Corona, California, which matched the sender information for the parcel described in Overt Act 77.

Overt Act No. 89: On June 29, 2023, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing tracking number ending in 8491 from a post office in Los Angeles, California. The parcel bore a Florida Everglades stamp, and the sender name J.R. at an address in Los Angeles, California, which matched the sender information for the parcels described in Overt Acts 61 and 86.

Overt Act No. 90: On June 29, 2023, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing tracking number ending in 5229 from a post office in Los Angeles, California. The parcel bore a Monument Valley stamp, and the sender name S.B.C. at an address in Glendora, California, which matched the sender information for the parcel described in Overt Act 71.

Overt Act No. 91: On June 29, 2023, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing tracking number ending in 8217 from a post office in Los Angeles, California. The parcel bore a Florida Everglades stamp, and the sender name J.C. at an address in Anaheim, California, which matched the sender information for the parcel described in Overt Act 56.

Overt Act No. 92: On June 29, 2023, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing tracking number ending in 0156 from a post office in Los Angeles, California. The parcel

1 bore a Monument Valley stamp, and the sender name J.M. at an address  
2 in Inglewood, California, which matched the sender information for  
3 the parcel described in Overt Act 75.

4       Overt Act No. 93:   On June 29, 2023, defendant NERSESYAN  
5 shipped a USPS Priority Mail envelope bearing tracking number ending  
6 in 0699 from a post office in Los Angeles, California. The parcel  
7 bore a Monument Valley stamp, and the sender name C.C. at an address  
8 in Los Angeles, California, which matched the sender information for  
9 the parcel described in Overt Act 73.

10       Overt Act No. 94:   On June 29, 2023, defendant NERSESYAN  
11 shipped a USPS Priority Mail envelope bearing tracking number ending  
12 in 0569 from a post office in Los Angeles, California. The parcel  
13 bore a Monument Valley stamp, and the sender name E.B. at an address  
14 in Encino, California, which matched the sender information for the  
15 parcel described in Overt Act 58.

16       **July 21, 2023 GRIGORYAN Methamphetamine Shipments**

17       Overt Act No. 95:   On July 21, 2023, defendant GRIGORYAN  
18 shipped a USPS Priority Mail envelope bearing a tracking number  
19 ending in 9997 from a post office in Glendale, California, and  
20 containing approximately 1.86 grams of methamphetamine. The parcel  
21 bore a Monument Valley stamp, and the sender name R.T. at an address  
22 in Oxnard, California, which matched the sender information for the  
23 parcel described in Overt Act 67.

24       Overt Act No. 96:   On July 21, 2023, defendant GRIGORYAN  
25 shipped a USPS Priority Mail envelope bearing a tracking number  
26 ending in 9980 with a Monument Valley stamp from a post office in  
27 Glendale, California, and containing approximately 1.012 grams of  
28 methamphetamine.

August 18, 2023 Methamphetamine Sale Via WhiteRepublic

Overt Act No. 97: On August 18, 2023, at least one co-conspirator operating the "WhiteRepublic" vendor account on the MGM Grand marketplace accepted an order for seven grams of methamphetamine, paid via Bitcoin, from a person who the co-conspirator believed was a drug buyer, but who, in fact, was an undercover FBI Analyst.

Overt Act No. 98: After receiving the Bitcoin payment from an FBI Analyst, at least one co-conspirator packed and shipped a parcel containing approximately 6.992 grams of methamphetamine to an FBI Special Agent, who received it on September 5, 2023.

January 9, 2024 NERSESYAN Methamphetamine Shipments

Overt Act No. 99: On January 9, 2024, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing a tracking number ending in 5226 from a USPS blue mailbox in Los Angeles, California, and containing approximately 1.95 grams of methamphetamine. The parcel bore the sender name S.H. at an address in Los Angeles, California, which matched the sender information for the parcel described in Overt Act 27.

Overt Act No. 100: On January 9, 2024, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing a tracking number ending in 1497 from a USPS blue mailbox in Los Angeles, California, and containing approximately 3.46 grams of methamphetamine. The parcel bore the sender name S.H. at an address in Los Angeles, California, which matched the sender information for the parcels described in Overt Acts 27 and 99.

January 12, 2024 NERSESYAN Cocaine Shipments

Overt Act No. 101: On January 12, 2024, defendant NERSESYAN drove to an address in Glendale, California, associated with defendant GRIGORYAN, parked, opened the trunk of a Honda Civic registered to GRIGORYAN at that address, and obtained a large quantity of envelopes from the Honda's trunk, before departing and driving to a USPS blue mailbox in Los Angeles, California.

Overt Act No. 102: On January 12, 2024, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing a tracking number ending in 4818 from a USPS blue mailbox in Los Angeles, California, and containing approximately 7.114 grams of a mixture and substance containing a detectable amount of cocaine. The parcel bore a Florida Everglades stamp, and the sender name R.K. at an address in Los Angeles, California, which matched the sender information for one of the parcels described in Overt Act 20.

Overt Act No. 103: On January 12, 2024, defendant NERSESYAN shipped a USPS Priority Mail envelope bearing a tracking number ending in 4795 from a USPS blue mailbox in Los Angeles, California and containing approximately 7.027 grams of a mixture and substance containing a detectable amount of cocaine. The parcel bore a Florida Everglades stamp, and the sender name S.H. at an address in Los Angeles, California, which matched the sender information for the parcels described in Overt Acts 27, 99, and 100.

May 23, 2024 NERSESYAN Methamphetamine and MDMA Shipments

Overt Act No. 104: On May 23, 2024, defendant NERSESYAN drove to an address in Glendale, California, associated with defendant GRIGORYAN, parked, opened the trunk of a Honda Civic registered to GRIGORYAN at that address, retrieved a brown box, and then drove to

1 approximately five different USPS blue mailboxes in El Segundo,  
2 California, and mailing approximately 143 USPS parcels.

3 Overt Act No. 105: On May 23, 2024, defendant NERSESYAN shipped  
4 a USPS Priority Mail envelope bearing a tracking number ending in  
5 6861 from a USPS blue mailbox in El Segundo, California, and  
6 containing approximately 14.103 grams of methamphetamine. The parcel  
7 bore a Monument Valley stamp, and the sender name F.W. at an address  
8 in Los Angeles, California, which matched the sender information for  
9 the parcels described in Overt Acts 24 and 40.

10 Overt Act No. 106: On May 23, 2024, defendant NERSESYAN shipped  
11 a USPS Priority Mail envelope bearing a tracking number ending in  
12 6892 from a USPS blue mailbox in El Segundo, California, and  
13 containing approximately 4.998 grams of methamphetamine. The parcel  
14 bore a Monument Valley stamp, and the sender name S.H. in Los  
15 Angeles, California, which matched the sender information for the  
16 parcels described in Overt Acts 27, 99, 100, and 103.

17 Overt Act No. 107: On May 23, 2024, defendant NERSESYAN shipped  
18 a USPS Priority Mail envelope bearing a tracking number ending in  
19 9961 from a USPS blue mailbox in El Segundo, California, and  
20 containing approximately 0.30 grams of MDMA. The parcel bore a  
21 Monument Valley stamp, and the sender name M.I. at an address in Los  
22 Angeles, California, which matched the sender information for one of  
23 the parcels described in Overt Act 20.

24 **July 11, 2024 GEVORGYAN MDMA and Ketamine Shipments**

25 Overt Act No. 108: On July 11, 2024, defendant GEVORGYAN drove  
26 to defendant GRIGORYAN's residence in Glendale, California, entered  
27 the residence, and exited a few minutes later with a bag, before  
28 proceeding at a high rate of speed to a post office in Montrose,

1 California, and later to another post office in La Cañada Flintridge,  
2 California.

3 Overt Act No. 109: On July 11, 2024, defendant GEVORGYAN  
4 shipped a USPS Priority Mail envelope bearing a tracking number  
5 ending in 9583 from a post office in La Cañada Flintridge,  
6 California, and containing approximately 2.015 grams of MDMA. The  
7 parcel bore a Monument Valley stamp, and the sender name F.W. at an  
8 address in Los Angeles, California, which matched the sender  
9 information for the parcels described in Overt Acts 24, 40, and 105.

10 Overt Act No. 110: On July 11, 2024, defendant GEVORGYAN  
11 shipped a USPS Priority Mail envelope bearing a tracking number  
12 ending in 8813 with a Monument Valley stamp from a post office in La  
13 Cañada Flintridge, California, and containing approximately 3.647  
14 grams of ketamine.

15 **August 27, 2024 AVALYAN Stamp Purchase**

16 Overt Act No. 111: On August 27, 2024, defendant AVALYAN  
17 purchased approximately 2,700 stamps for \$2,717 in cash from a post  
18 office in Glendale, California.

19 **September 2024 Darknet Drug Listings**

20 Overt Act No. 112: On September 16, 2024, a co-conspirator  
21 operating the "TomorrowLand" vendor account on the Archetyp market  
22 advertised, "Purest METH Crystal Shards (Methamphetamine)" with an  
23 option to purchase 56 grams for 4.902 Monero cryptocurrency, and  
24 further advertised that the drugs were sourced from the United States  
25 and could be shipped within the United States.

26 Overt Act No. 113: On September 16, 2024, a co-conspirator  
27 operating the "WhiteRepublic" vendor account on the Archetyp market  
28 advertised, "[Finalize Early]!!!FE Discount!!! Crystal

1 Methamphetamine AAA++" with an option to purchase 500 grams for  
2 35.4478 Monero cryptocurrency, and further advertised that the drugs  
3 were sourced from the United States and could be shipped within the  
4 United States.

5 Overt Act No. 114: On September 18, 2024, a co-conspirator  
6 operating the "JoyInc" vendor account on the Archetyp market  
7 advertised, "[Finalize Early] LIMITED Quantity Discount for WHITE  
8 LOTUS 93% COCAINE" with an option to purchase 1000 grams for 150.9634  
9 Monero cryptocurrency, and further advertised that the drugs were  
10 sourced from the United States and could be shipped within the United  
11 States.

12 **February 2025 Darknet Drug Listings**

13 Overt Act No. 115: On February 3, 2025, a co-conspirator  
14 operating the "LaFarmacia" vendor account on the Abacus market  
15 advertised, "28G + 2G FREE Crystal 'Diamond' Meth (Methamphetamine)"  
16 for 0.00426780 Bitcoin cryptocurrency, with shipment from the United  
17 States to within the United States.

18 Overt Act No. 116: On February 4, 2025, a co-conspirator  
19 operating the "JanesAddiction" vendor account on the Abacus market  
20 advertised, "28g Methamphetamine - Uncut Pure Crystal Ice Meth" for  
21 0.00423732 Bitcoin cryptocurrency, with shipment from the United  
22 States to within the United States, along with 65 views and 4 sales  
23 of the advertisement.

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1 COUNT TWO

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

3 [DEFENDANT AVALYAN]

4 On or about June 12, 2023, in Los Angeles County, within the  
5 Central District of California, defendant DAVIT AVALYAN, and others  
6 known and unknown to the Grand Jury, each aiding and abetting the  
7 others, knowingly and intentionally distributed cocaine, a Schedule  
8 II narcotic drug controlled substance.

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1 COUNT THREE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

3 [DEFENDANT AVALYAN]

4 On or about June 12, 2023, in Los Angeles County, within the  
5 Central District of California, defendant DAVIT AVALYAN, and others  
6 known and unknown to the Grand Jury, each aiding and abetting the  
7 others, knowingly and intentionally distributed 3, 4-  
8 Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled  
9 substance.

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1 COUNT FOUR

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

3 [DEFENDANT AVALYAN]

4 On or about June 12, 2023, in Los Angeles County, within the  
5 Central District of California, defendant DAVIT AVALYAN, and others  
6 known and unknown to the Grand Jury, each aiding and abetting the  
7 others, knowingly and intentionally distributed methamphetamine, a  
8 Schedule II controlled substance.

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1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT GRIGORYAN]

4 On or about July 21, 2023, in Los Angeles County, within the  
5 Central District of California, defendant HAYK GRIGORYAN, also known  
6 as "Hayk Greg," knowingly and intentionally possessed with intent to  
7 distribute methamphetamine, a Schedule II controlled substance.

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1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT NERSESYAN]

4 On or about January 9, 2024, in Los Angeles County, within the  
5 Central District of California, defendant GURGEN NERSESYAN, also  
6 known as "Guro Tiko," knowingly and intentionally possessed with  
7 intent to distribute methamphetamine, a Schedule II controlled  
8 substance.

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1 COUNT SEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT NERSESYAN]

4 On or about January 12, 2024, in Los Angeles County, within the  
5 Central District of California, defendant GURGEN NERSESYAN, also  
6 known as "Guro Tiko," knowingly and intentionally possessed with  
7 intent to distribute cocaine, a Schedule II narcotic drug controlled  
8 substance.

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1 COUNT EIGHT

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

3 [DEFENDANT NERSESYAN]

4 On or about May 23, 2024, in Los Angeles County, within the  
5 Central District of California, defendant GURGEN NERSESYAN, also  
6 known as "Guro Tiko," knowingly and intentionally possessed with  
7 intent to distribute at least five grams, that is, approximately  
8 14.103 grams, of methamphetamine, a Schedule II controlled substance.

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1 COUNT NINE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT NERSESYAN]

4 On or about May 23, 2024, in Los Angeles County, within the  
5 Central District of California, defendant GURGEN NERSESYAN, also  
6 known as "Guro Tiko," knowingly and intentionally possessed with  
7 intent to distribute methamphetamine, a Schedule II controlled  
8 substance.

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1 COUNT TEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT NERSESYAN]

4 On or about May 23, 2024, in Los Angeles County, within the  
5 Central District of California, defendant GURGEN NERSESYAN, also  
6 known as "Guro Tiko," knowingly and intentionally possessed with  
7 intent to distribute 3, 4-Methylenedioxymethamphetamine ("MDMA"), a  
8 Schedule I controlled substance.

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1 COUNT ELEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 [DEFENDANT GEVORGYAN]

4 On or about July 11, 2024, in Los Angeles County, within the  
5 Central District of California, defendant HRANT GEVORGYAN knowingly  
6 and intentionally possessed with intent to distribute 3, 4-  
7 Methylene dioxy methamphetamine ("MDMA"), a Schedule I controlled  
8 substance.

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1 COUNT TWELVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i)]

3 [DEFENDANT GEVORGYAN]

4 On or about July 11, 2024, in Los Angeles County, within the  
5 Central District of California, defendant HRANT GEVORGYAN knowingly  
6 and intentionally possessed with intent to distribute ketamine, a  
7 Schedule III controlled substance.

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1 FORFEITURE ALLEGATION

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 21,  
6 United States Code, Section 853, in the event of any defendant's  
7 conviction of the offenses described in any of Counts One through  
8 Twelve of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 a. All right, title and interest in any and all property,  
12 real or personal, constituting or derived from, any proceeds which  
13 said defendant obtained, directly or indirectly, from any such  
14 offense;

15 b. All right, title and interest in any and all property,  
16 real or personal, used, or intended to be used, in any manner or  
17 part, to commit, or to facilitate the commission of any such offense;  
18 and

19 c. To the extent such property is not available for  
20 forfeiture, a sum of money equal to the total value of the property  
21 described in subparagraphs (a) and (b).

22 3. Pursuant to Title 21, United States Code, Section 853(p),  
23 any defendant so convicted shall forfeit substitute property if, by  
24 any act or omission of said defendant, the property described in the  
25 preceding paragraph, or any portion thereof: (a) cannot be located  
26 upon the exercise of due diligence; (b) has been transferred, sold  
27 to, or deposited with a third party; (c) has been placed beyond the  
28 jurisdiction of the court; (d) has been substantially diminished in

1 value; or (e) has been commingled with other property that cannot be  
2 divided without difficulty.

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4 A TRUE BILL  
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8 /S/  
9 Foreperson  
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11 JOSEPH T. MCNALLY  
12 Acting United States Attorney  
13

14 *Lindsey Greer Dotson*  
15 LINDSEY GREER DOTSON  
16 Assistant United States Attorney  
17 Chief, Criminal Division  
18

19 J. MARK CHILDS  
20 Assistant United States Attorney  
21 Chief, International Narcotics,  
22 Money Laundering & Racketeering  
23 Section  
24

25 BRITTNEY M. HARRIS  
26 Assistant United States Attorney  
27 Deputy Chief, International  
28 Narcotics, Money Laundering &  
Racketeering Section  
29

30 JAMES A. SANTIAGO  
31 Assistant United States Attorney  
32 International Narcotics, Money  
33 Laundering & Racketeering Section  
34  
35  
36  
37  
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